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ILLINOIS COMMERCE COMMISSION

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Patrick Quinn)
)
Petition to the Members of the Illinois) 01-0046
Commerce Commission Pursuant to)
Section 5-145(b) of the Illinois)
Administrative Procedure Act.)

PETITION OF MT. CARMEL PUBLIC UTILITY CO. TO INTERVENE

Now comes Mt. Carmel Public Utility Co., by its attorneys, Koger & Bramlet, P.C., and respectfully seeks leave to intervene in the above captioned proceeding and in support thereof states as follows:

1. Mt. Carmel Public Utility Co. is an Illinois Corporation with its principal place of business located at 316 Market Street, Mt. Carmel, Illinois.
2. Mt. Carmel Public Utility Co. is engaged in the business of distributing and selling electricity and natural gas as a public utility within the meaning of the Illinois Public Utilities Act, 220 ILCS 5/1-101, et seq.
3. A Petition entitled "Administrative Petition for an Emergency Rule to Bar Illinois Natural Gas Utility Companies from Giving Credit Bureaus any Information About Their Customers With Late Heating Bills or Convenient Payment Plans" was filed with the Commission by Petitioner Patrick Quinn on January 17, 2001.
4. The Petition requests the Illinois Commerce Commission to initiate an emergency rule that would bar Illinois natural gas utility companies from turning over to credit bureaus any information about their customers who have a natural gas bill which is past due or who have elected to participate in a convenient payment plan.

5. Mt. Carmel Public Utility Co.'s interest cannot be adequately represented by any other party.

6. Mt. Carmel Public Utility Co.'s intervention will not delay this proceeding.

WHEREFORE, Mt. Carmel Public Utility Co. respectfully requests leave to intervene in this proceeding.

DATED this 5th day of February, 2001.

Respectfully Submitted,

MT. CARMEL PUBLIC UTILITY CO.

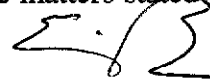
By



Eric Bramlet


VERIFICATION

I, Eric Bramlet, first being duly sworn upon oath depose and say that I am Vice President and General Counsel for Mt. Carmel Public Utility Co., an Illinois corporation; that I have read the above and foregoing Petition by me subscribed and know the contents thereof; that said contents are true in substance and in fact, except as to those matters stated upon information and belief, and as to those, I believe same to be true.



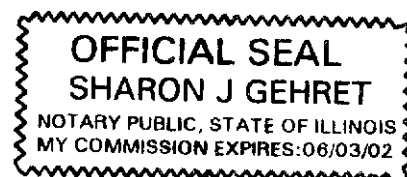
ERIC BRAMLET, Vice President and
General Counsel

Subscribed and sworn to before me this 5th day of February, 2001.



Notary Public

Eric Bramlet
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Mt. Carmel, Illinois 62863
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Attorneys for Mt. Carmel Public Utility Co.



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NOTICE OF FILING AND CERTIFICATE OF SERVICE

TO: See Attached Service List

PLEASE TAKE NOTICE that on the 5th day of February, 2001, Mt. Carmel Public Utility Co. caused to be filed with the Chief Clerk of the Illinois Commerce Commission by depositing in a United States Post Office Box in Mt. Carmel, Illinois, the following documents contained in an envelope properly addressed with postage fully prepaid:

Petition of Mt. Carmel Public Utility Co. to Intervene
Entry of Appearance
Notice of Filing and Certificate of Service

DATED this 5th day of February, 2001.



Eric Bramlet, Attorney at Law

CERTIFICATE OF SERVICE

The undersigned attorney does hereby certify that he served a copy of the foregoing listed documents on behalf of Mt. Carmel Public Utility Co., upon all parties listed on the attached Service List, by depositing same, with postage fully prepaid, in a U.S. Post Office box in Mt. Carmel, Illinois on the 5th day of February, 2001.



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Service List 01-0046

Gerard T. Fox, James Hinchliff,
Mary Klyasheff & Timothy Walsh
People Gas/North Shore
130 E. Randolph Dr., 23rd Fl.
Chicago, IL 60601

Karen M. Huizenga
MidAmerian Energy Company
106 East Second Street
Davenport, IA 52801

Joseph L. Lakshmanan
Illinois Power Company
500 S. 27th Street
Decatur, IL 62521-2200

Patrick Quinn
1852 N. Nashville
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